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July 18, 2022

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Via Email (CottNYSDChambers@nysd.uscourts.gov)

Hon. James L. Cott
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Jane Doe v. The National Ramah Commission, Camp Ramah and Rabbi Ethan Linden*
22-cv-03621 (ALC)(JLC)

Dear Judge Cott:

We are submitting this request on behalf of Defendants, The National Ramah Commission (“NRC”), Camp Ramah in the Berkshires (“CRB” or “camp”) and Rabbi Ethan Linden (“Rabbi Linden”) (collectively, “Defendants”) in connection with the above-referenced matter, which is scheduled for a mediation before you on July 25, 2022. Counsel for Defendants respectfully request two additional business days to submit our *ex parte* mediation statement to Your Honor for review. If granted, this would make our submission due on Wednesday, July 20, 2022. The reason for this request is two-fold: (1) undersigned counsel for the entities has only recently been engaged in the matter and, therefore, it has taken some time to conduct an investigation sufficient to draft our submission and, (2) due to the number of parties involved on behalf of Defendants, we would greatly appreciate this additional time in order for all of the Defendant representatives an opportunity to review and approve the submission. Included in this second consideration is the fact that Defendants’ counsel have been working collaboratively so that Defendants may jointly submit a single submission for purposes of the mediation.

Undersigned counsel has conferred with Plaintiff’s counsel, and they assent to this request.

Thank you for your consideration of this request.



Attorneys at Law

United States Magistrate

Judge

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Very truly yours,

JACKSON LEWIS P.C.


Paul V. Kelly

cc: Michael Gerber, Esq.
Ben Arad, Esq.
Wylie Stecklow, Esq/